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April 10, 2009

Alex Sherrin  
On-Scene Coordinator  
USEPA  
1 Congress St., Suite 1100  
Boston, MA 02114-2023

Re: Response to March 6, 2009 Letter  
Downeast Energy Bulk Oil Storage Facility  
Springvale, Maine  
EPA Docket #09-308-019  
St.Germain File No.: 2726.2



Dear Mr. Sherrin:

St.Germain & Associates, Inc. (St.Germain), on behalf of Downeast Energy, is providing you with this response to EPA's March 6, 2009 letter from Denny Dart to Richard Morrell and Sue Roberts of Downeast Energy.

### **Downeast Springvale**

Insufficient Secondary Containment: St.Germain retained the services of a professional land surveyor to perform a topographical survey of the facility. The topography is shown on the enclosed Site Plan. As shown, any oil discharges in the vicinity of the tanks and loading/off loading areas should flow in a south and southwest direction to a containment area. The containment area has the capacity to store approximately 50,000 gallons of liquid.

### Inadequate Security Measures:

As described in the SPCC Plan (Revision 1, January 2009), Downeast Energy has implemented sufficient security measures for this facility. These measures include:

1. The large bulk storage tanks are equipped with locked drain valves.
2. The 500-gallon waste oil and the 275 fuel oil tanks do not have drain valves.
3. The 275-gallon fuel oil tanks are located inside the building which is locked when the facility is unattended.
4. The 500-gallon waste oil tank is located inside a totally enclosed structure, which is locked when the facility is unattended.
5. The large bulk storage tanks are equipped with locking valves on the product piping.
6. The product piping at the bulk storage tank unloading area contains check valves that do not permit flow of product from the tank back toward the fill ports.
7. The oil transfer pumps and starter controls are located inside a small wooden shed, which is locked when the facility is unattended; power to the pump controls is controlled by switches located inside a box on the exterior wall of the office building. This box is locked when the facility is unattended. There are

emergency shut-off buttons located inside the building near dispatch that can be activated in an emergency situation.

8. Out-of-service piping is capped.
9. Four dusk-to-dawn lights are located at the facility. This lighting allows personnel to identify a significant spill and/or leak during hours of darkness, and deters vandalism. Additional switch and motion-detection lighting is located at the loading rack, off loading area and on the office building exterior wall.

Overfill Alarms:

The overfill alarms are repaired and operational. The alarms will be tested on a monthly basis.

Integrity Testing:


The tanks were cleaned on April 9<sup>th</sup>, and the testing will be completed on Monday April 13<sup>th</sup>. If requested, copies of the testing reports will be provided to EPA.

**Additional Facilities**

Downeast Energy has been working diligently over the past 3 months to complete improvements at their other facilities. As shown in the enclosed table, six facilities are now fully in compliance with the SPCC rules (whereas in late January, only two facilities were in complete compliance – refer to table attached to our January 30<sup>th</sup> letter to EPA). Also, other than the Waterville facility, the other six facilities will be in compliance by July 1, 2009 (previously shown as August 15, 2010).

Downeast Energy is looking forward to discussing SPCC compliance for all their facilities at the conference call scheduled for 10:00 AM on Tuesday April 14<sup>th</sup>. In the meantime, feel free to contact us at 207-591-7000 if you have any questions.

Sincerely,  
ST.GERMAIN & ASSOCIATES, INC.



Scott D. Collins, P.E.  
Vice President

enclosures

cc: Sue Roberts, Downeast Energy  
Steve Hall, Downeast Energy  
John Peters, Downeast Energy

Downeast Storage Facilities  
All Owned/Operated by Downeast Energy  
Update: 04/10/2009

	# of Emp.	SPCC Needed?	SPCC Done?	Eng'ed Plan?	SPCC Plan Fully Implemented?*	Time Frame for Full Compliance	Additional Measures
Downeast Energy 4 Paul Street Brunswick, ME 04011	0	Yes	Yes	Yes	Yes	7/1/2009	1. Install overfill alarms on storage tanks. 2. Perform integrity testing on 14,000-gal tanks (tanks cleaned on April 9th, testing scheduled for April 10th).
Downeast Energy 36 Stanwood Street Brunswick, ME 04011	0	Yes	Yes	Yes	Yes	Compliant	None
Downeast Energy 8 Railroad Square Yarmouth, ME 04096	2	Yes	Yes	Yes	Yes	Compliant	None
Downeast Energy 172 Main Street S. Portland, ME 04106	15	Yes	Yes	Yes	Yes	Compliant	None
Downeast Energy 95 College Avenue Waterville, ME 04903	4	Yes	Yes	Yes	Yes	11/1/2010	1. Secondary containment for tanks and options for other improvements are being reviewed.
Downeast Energy 14 Depot Street Kennebunk, ME 04043	18	Yes	Yes	Yes	Yes	7/1/2009	1. Perform integrity testing on 150,000-gal tank (cleaning quote received). 2. Provide secondary containment for small heating oil and kerosene storage tanks.
Downeast Energy 608 Elm Street Biddeford, ME 04005	3	Yes	Yes	Yes	Yes	7/1/2009	1. Provide secondary containment for off-loading area.
Downeast Energy 134 Manchester Road Windham, ME 04062	12	Yes	Yes	Yes	Yes	6/1/2009	1. Repair secondary containment berm (waiting for asphalt batch plants to open).
Downeast Energy 63 Fourth Street Dover, NH 03824	11	Yes	Yes	Yes	Yes	Compliant	None
Downeast Energy (not-in-service) 23 Mt. Vernon Avenue Augusta, ME 04332	0	Yes	Yes	Yes	Yes	Compliant	None
Downeast Energy 283 Whitten Road Hallowell, ME 04337	13	Yes	Yes	Yes	Yes	Compliant	None
Downeast Energy 288 River Road Springvale, ME 04083	10	Yes	Yes	Yes	Yes	4/13/2009	1. Perform integrity testing on 6 storage tanks (tanks cleaned on April 9th, testing scheduled for April 13th).
Downeast Energy 1464 Pond Road Mt. Vernon, ME 04352	5	Yes	Yes	Yes	Yes	7/1/2009	1. Provide secondary containment for off-loading area and loading rack (design completed, and contract awarded).

\* Fully Implemented denotes that SPCC Plan is written and is being followed, and tasks such as training, inspections and testing have been and/or are currently being conducted on a regular schedule.

